

matter, but has no recollection of a specific request for help.²⁸⁷ McAuliffe insists that he agreed to do – and did – nothing in response to O’Connor’s comments about the Hudson matter. He further recalls that O’Connor subsequently “bombed” him with phone calls on Hudson to the point that he had O’Connor taken off of his “call list,” so that he would not be distracted by the calls.²⁸⁸

O’Connor also copied McAuliffe on a June 2, 1995, facsimile he sent to the White House, Interior and Hill staffs asserting that the Hudson application would set a bad precedent for other Wisconsin dog tracks seeking to convert their facilities to Indian casinos. O’Connor billed the St. Croix for discussions with Corcoran on June 6 “regarding Terry MacAuliffe [sic] arranging appointment with Harold Ickes,” and discussions with Kitto on June 19 “regarding support to be given to Committee to Re-elect and D.N.C.” Finally, on July 14, 1995, O’Connor met with Kitto and recorded time spent discussing “necessity to follow-up with . . . Terry Mac at the Committee to Re-elect – outlining fund raising strategies.”

McAuliffe dismisses the notion that there was any connection between the general fund-raising efforts of the re-election campaign or its national finance board and the Indians opposing Hudson casino application, and asserts that he and Hartigan never expected O’Connor would be

²⁸⁷McAuliffe acknowledges that contributors approached him "all the time" and everywhere he went with requests for assistance in matters before the Administration, but maintains that he followed the re-election campaign’s instructions that he "never call a department" himself. Grand Jury Testimony of Terence McAuliffe, July 16, 1999, at 48-50 (hereinafter "McAuliffe G.J. Test."). Instead, he would relay the matter to the Political Affairs staff at the White House, and let them "handle the traffic," and decide what should be done with the request. *Id.* In the Hudson matter, though, he asserts that he did not even do that much. *Id.* at 50-51.

²⁸⁸*Id.* at 46.